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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

JACOB GREGOIRE,

Plaintiff,

v.

CALIFORNIA HIGHWAY PATROL, an
agency of the State of California;
SERGIO FLORES, and DOES 1 to 20,

Defendants.

CASE NO. 14-cv-1749-GPC (DHB)

**JOINT MOTION TO EXTEND TIME
TO RESPOND TO MOTION FOR
SUMMARY JUDGMENT AND TO
REPLY TO RESPONSE**

Date: Ex Parte
Time: Ex Parte
Courtroom: 2D
Judge: The Honorable Gonzalo P. Curiel

On December 8, 2015, the parties filed a joint motion to extend time to respond to Motion for Summary Judgment and to Reply to Response. The Court ordered that the time for Plaintiff to respond to the motion for summary judgment was extended to January 8, 2015 and the time for Defendants to reply to the response was extended to January 15, 2016.

After reviewing these materials needed for opposition, the parties now realize additional time will be necessary because of the protective order and the state's designation of materials as confidential. Therefore, the parties jointly move for an order extending the time for Plaintiff to respond to the motion for summary judgment to January 19, 2016 and extending the time for Defendants to reply to February 2, 2016. This joint motion is made for the following reasons:

1. Plaintiff's counsel needs additional time in reviewing documents and deposition testimony that involve production of confidential, proprietary or private information for which special protection from public disclosure and from use for any purpose other than prosecuting this litigation may be warranted. Plaintiff's counsel needs to address concerns for appropriate paperwork to file documents under seal including a Joint Motion and Proposed Order.

2. One extension of time has been requested for the briefing of this motion. The parties therefore jointly move for an order extending the time to respond to Defendants' motion for summary judgment to January 19, 2016 and the time for Defendants to reply to February 2, 2016.

Respectfully submitted,

Dated: January 5, 2016

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1 Dated: January 5, 2016

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18 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies
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20 California I certify that I certify that the content of this document is acceptable to
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22 counsel to affix their electronic signatures to this document.

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